

Exhibit A

Proposed Case Schedule

- (1) The parties may amend the pleadings or add new parties without leave of court by **September 30, 2025**. Amendments thereafter may be made only with leave of Court.
- (2) The party claiming patent infringement must serve on all parties the Disclosure of Asserted Claims and Infringement Contentions as required by E.D. Tex. Patent Local Rule 3-1 and produce documents as required by E.D. Tex. Patent Local Rule 3-2 by **August 29, 2025**.
- (3) The party claiming invalidity must serve on all parties the Disclosure of Invalidity Contentions as required by E.D. Tex. Patent Local Rule 3-3 and produce documents as required by E.D. Tex. Patent Local Rule 3-4 by **September 30, 2025**.
- (4) Each party will simultaneously exchange the Proposed Claim Terms and Phrases for Construction per E.D. Tex. Patent Local Rule 4-1 by **November 15, 2025**.
- (5) Each party contending a claim term or phrase should be construed by the Court shall provide the parties with the proposed Preliminary Claim Construction of each such term or phrase and supporting intrinsic and extrinsic evidence per E.D. Tex. Patent Local Rule 4-2 by **December 15, 2025**.
- (6) The parties shall meet and confer regarding claim construction issues, including limiting the terms in dispute and procedures for the Claim Construction Hearing, by **December 30, 2025**.
- (7) The parties shall file a Joint Disputed Claim Terms Chart and Prehearing Statement per E.D. Tex. Patent Local Rule 4-3 by **January 15, 2026**.
- (8) The parties shall complete discovery related to Claim Construction by **March 16, 2026**.
- (9) Fall Line shall file and serve an Opening Claim Construction Brief per E.D. Tex. Patent Local Rule 4-5 by **March 30, 2026**.
- (10) Instacart may file and serve a response to the Opening Claim Construction Brief per E.D. Tex. Patent Local Rule 4-3 by **April 13, 2026**.

- (11) Fall Line may file and serve a reply Claim Construction Brief per E.D. Tex. Patent Local Rule 4-3 by April 20, 2026.
- (12) Instacart may file and serve a sur-reply Claim Construction Brief by **April 27, 2026**.
- (13) The Court shall conduct a hearing on the issue of Claim Construction on **May 11, 2026** (14 days after submission of the sur-reply, subject to the convenience of the Court's calendar).
- (14) The parties shall complete fact discovery by **September 2, 2026** and all interrogatories, depositions, requests for admissions, and requests for production shall be served within sufficient time to allow responses to be completed prior to the close of fact discovery.
- (15) Each party shall make its initial expert witness disclosures, as required under Rule 26, on the issues on which each bears the burden of proof, on **October 2, 2026**.
- (16) Rebuttal expert witness disclosures are to be made on **November 2, 2026**.
- (17) Expert Depositions, if any, shall be completed by **December 30, 2026**.
- (18) Motions for summary judgment be filed by **January 29, 2027**, responses to such motions shall be filed within **30 days** thereafter, and reply briefs shall be filed within **14 days** thereafter.
- (19) The Court shall conduct a pretrial conference on a date suitable to the Court's schedule.
- (20) The trial shall commence on a date suitable to the Court's schedule.